Comments Regarding Docket Number 25-133
“In Re: Delete, Delete, Delete”

In consideration of improvements to the Part 97 regulations covering the Amateur Radio Service, I offer the following suggestions:

1. Change the required station ID time from 10 to 30 minutes. This could be especially helpful during net operation, and it’s often impossible to comply with the 10-minute ID requirement in a long-winded roundtable QSO.

2. Make 60 meters a regular Amateur band just like the others. This may be done by moving the other agencies’ reserved frequencies to either side while still retaining all assignments for all users. As these discrete individual channels are NTIA federal and military assignments currently in-between the existing Amateur 60 meter Channels 1-5, retaining the total number of assignments for military and federal agencies should be feasible via a reasonable coordination arrangement made through negotiations with the NTIA. This doesn’t have to be a zero-sum situation for any of the interested parties.

3. Remove the mode sub-band restrictions, as is currently done with the 160 meter band; let voluntary band plan agreements be the norm. This would solve the digital voice (FreeDV) on HF frequency selection problem, and make the arguments moot as to whether that mode is a digital or voice mode (it's actually both) as it pertains to which sub-band it belongs in. I doubt that things would be much different, due to long established common practice. Concern about whether voice or digital is straying outside of an artificial sub-band should not be part of operating within the overall Amateur band allocations; case in point is CW operation, which remains mostly in the lower part of the HF bands through institutional practice even though it’s allowed on all Amateur frequencies.

4. Allow all publicly defined modes of operation on amateur bands, and define all mode usage via bandwidth instead of bitrate as was done in a recent change. In this way, (heretofore) uncommon modes such as xHE-AAC (Extended High-Efficiency Advanced Audio Coding, a state-of-the-art audio compression format designed for efficient voice streaming) could exist alongside VARA based modes as well as standard analog SSB—the key being the individual signal remaining withing a specified bandwidth.

5. Retain incentive licensing allocations, although it might be beneficial to adjust them in places where a strong use case is demonstrated.

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